

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

GERALD W. CORDER,

Plaintiff,

v.

**ANTERO RESOURCES CORPORATION,
a Delaware corporation,**

Defendant.

**Civil Action No. 1:18-CV-30
Hon. Judge Irene M. Keeley**

c/w 1:18CV31, 1:18CV32,
1:18CV33, 1:18CV34, 1:18CV35,
1:18CV36, 1:18CV37, 1:18CV38,
1:18CV39, 1:18CV40 for purposes
of discovery and setting schedule

**ANTERO RESOURCES CORPORATION'S SUPPLEMENTAL RESPONSE TO
PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANT**

Antero Resources Corporation ("Antero") submits the following supplemental response to Plaintiffs' Second Interrogatories in accordance with Federal Rules of Civil Procedure 26 and 33 and Local Rules of Civil Procedure 26.02 and 33.01 and maintains the objections contained in its original response served on December 30, 2019.

INTERROGATORY NO. 1: On a **monthly basis**, during the "relevant period" (See definitions,) to the present state the following for all natural gas, oil and liquids (NGLs) which were produced or extracted from plaintiffs' oil and natural gas interests as described in leases identified in plaintiffs' complaints as consolidated. For all liquids (NGLs,) identify the amount for each hydrocarbon and type thereof after the gas was processed and state the answers to all questions below for each plaintiff for each month for each well:

- a. The gross volume by mcf and dth for all natural gas extracted from the plaintiffs' leaseholds (monthly;)
- b. Identify the name and address of all persons, firms or corporations who were responsible for and caused the natural gas to be metered and transported to the point it was finally sold, whether as natural gas or NGLs or other product (monthly;)

- (iii) The btu value and energy value of the gas when it was produced and extracted from the wellhead; and
 - (iv) Was the natural gas processed and, if so, what was the btu and energy value of the gas (1) after it was processed and (2) at the time it was sold to a third party, on a monthly basis.
- h. State monthly, the volumes of gas produced and for that month, state the volumes of gas sold and, if the amount sold is less than produced for that month, identify and state each and every reason the amount sold was less than the amount produced and for each, state the amount of gas used for fuel, lost or otherwise not transported and sold. If there was volume lost in processing, state the amount lost on a monthly basis compared to the gas produced or extracted for that month;
- i. State the amount of money per mcf and per dth on a monthly basis that you received from the sale of natural gas produced from plaintiffs' leaseholds; and

SUPPLEMENTAL RESPONSE: Without waiving its objections as set forth below, Antero submits supplemental responses to certain subparts as follows:

- a. Subject to the objections and limitations set forth in Antero's Response to Interrogatory No. 1(a), *see* Antero's supplemental response to Request for Production No. 1(a).
- f. Subject to the objections and limitations set forth in Antero's Response to Interrogatory No. 1(f), *see* Antero's supplemental response to Request for Production No. 1(h).
- g. Subject to the objections and limitations set forth in Antero's Response to Interrogatory No. 1(g), *see* Antero's supplemental response to Request for Production No. 1(i).
- h. Subject to the objections and limitations set forth in Antero's Response to Interrogatory No. 1(h), *see* Antero's supplemental response to Request for Production No. 1(j).

INTERROGATORY NO. 2: For the relevant period and for each month, describe in detail the manner and methods that you used to arrive at the amount of money to pay plaintiffs'

royalty which was due plaintiffs for all the natural gas, oil, constituents, by-products and/or liquids (NGLs) which were produced (extracted) from plaintiffs' leasehold estates. If the method changed or was amended for any reason, state the date it was changed and the reason why it was changed and how it was changed.

SUPPLEMENTAL RESPONSE: Subject to the objections and limitations set forth in Antero's Response to Interrogatory No. 2, Antero states that Antero has not processed the gas produced from Plaintiffs' wells in this action, or manufactured natural gas liquids therefrom, since August 2018 production month. Because Antero has not processed the gas produced from Plaintiffs' wells in this action since August 2018 production month, the PRC2 upgrade calculation described in Antero's original response to Interrogatory No. 2 has not applied since that time. Plaintiffs have not had a "net factory value" or "shrink value" to compare during this period. Beginning in September 2018 production month, Antero has not received revenues from the sale of NGLs attributable to the gas produced from Plaintiffs' wells in this action, nor has Antero converted any gas in the processing and fractionation processes used to produce the NGLs. Accordingly, since September 2018 production month, Antero has paid Plaintiffs the weighted average sales price ("WASP") for the unprocessed gas produced from Plaintiffs' wells in this action. The TRN3 upgrade analysis described in Antero's original response to Interrogatory No. 2 is unaffected by the fact that the gas from Plaintiffs' wells has not been processed since August 2018 production month. *See* updated and replacement NGL and shrink value information as Bates-numbered AGC-012694 to AGC-012702 and updated and replacement volume and value information as Bates-numbered AGC-012703 to AGC-012730.

/s/ 
W. Henry Lawrence (WV Bar #2156)
hank.lawrence@steptoe-johnson.com
Amy M. Smith (WV Bar #6454)
amy.smith@steptoe-johnson.com
Shaina D. Massie (WV Bar #13018)
shaina.massie@steptoe-johnson.com
Steptoe & Johnson PLLC
400 White Oaks Boulevard
Bridgeport, WV 26330
(304) 933-8000

Counsel for Antero Resources Corporation

VERIFICATION

STATE OF COLORADO,

COUNTY OF DENVER, TO-WIT:

Alvyn A. Schopp, being first duly sworn, states that he is employed by Antero Resources Corporation as Chief Administrative Officer & Regional Senior Vice President, that he has read the foregoing answers to interrogatories in "Antero Resources Corporation's Supplemental Response to Plaintiffs' Second Set of Interrogatories to Defendant" and that the responses therein are true and correct to the best of his belief and knowledge.



Alvyn A. Schopp

Taken, subscribed and sworn to before me this 26th day of March 2020.

My commission expires: 12/26/23.



Notary Public

[NOTARIAL SEAL]



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CERTIFICATE OF SERVICE

I hereby certify that on 27th day of March 2020, I electronically filed this Certificate of Service for “*Antero Resources Corporation’s Supplemental Response to Plaintiffs’ Second Set of Interrogatories to Defendant*” with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the following CM/ECF participants:

Marvin W. Masters, Esquire
April D. Ferree, Esquire
The Masters Law Firm, LC
181 Summers Street
Charleston, WV 25301

I further certify that I have mailed this day by United States Postal Service “*Antero Resources Corporation’s Supplemental Response to Plaintiffs’ Second Set of Interrogatories to Defendant*” to the same counsel of record listed above.

/s/ W. Henry Lawrence

W. Henry Lawrence (WV Bar #2156)

hank.lawrence@steptoe-johnson.com

Amy M. Smith (WV Bar #6454)

amy.smith@steptoe-johnson.com

Shaina D. Massie (WV Bar #13018)

shaina.massie@steptoe-johnson.com

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Bridgeport, WV 26330

(304) 933-8000

Counsel for Antero Resources Corporation